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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Sonny Alexander Ramirez,)	Case No. 1:25-cv-00134-BAM
Plaintiff,)	STIPULATION AND PROPOSED
vs.)	ORDER FOR EXTENSION OF
)	TIME
Leland Dudek, ACTING)	
COMMISSIONER OF SOCIAL)	
SECURITY ¹ ,)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from April 28, 2025

¹ Leland Dudek became the Acting Commissioner of Social Security on February 16, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Leland Dudek should be substituted for Michelle King as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 to June 27, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION
2 FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order
3 shall be extended accordingly.

4 This is Plaintiff's first request for an extension of time. Plaintiff respectfully
5 states that the requested extension is necessary due several merit briefs being due
6 on the same week. For the weeks of April 28, 2025 and May 5, 2025, Counsel has
7 fourteen merit brief due. Counsel requires additional time to brief the issues
8 thoroughly for the Court's consideration. Defendant does not oppose the requested
9 extension. Counsel apologizes to the Defendant and Court for any inconvenience
10 this may cause.

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12 Respectfully submitted,

13 Dated: April 2, 2025

PENA & BROMBERG, ATTORNEYS AT LAW

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15 By: /s/ Jonathan Omar Pena
16 JONATHAN OMAR PENA
17 Attorneys for Plaintiff

18
19 Dated: April 2, 2025

20 PHILLIP A. TALBERT
21 United States Attorney
22 MATHEW W. PILE
23 Associate General Counsel
24 Office of Program Litigation
25 Social Security Administration

26 By: */s/ Justin Lane Martin
27 Justin Lane Martin
28 Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on April 2, 2025)

ORDER

Pursuant to stipulation and good cause appearing, Plaintiff shall serve Defendant with and file Plaintiff's Motion for Summary Judgment on or before **June 27, 2025**. All other dates in the Court's Scheduling Order are extended accordingly.

IT IS SO ORDERED.

Dated: April 3, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE